

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

REPLY IN OPPOSITION OF THE UNITED STATES POSTAL SERVICE TO
THE MOTION TO COMPEL OF DAVID B. POPKIN (DBP/USPS-157)
(August 2, 2006)

On July 13, the Postal Service objected to the following interrogatory of David B. Popkin, filed on July 3, 2006: DBP/USPS-157. Mr. Popkin filed a motion to compel on July 25. The Postal Service hereby opposes that motion.

DBP/USPS-157

The question reads:

DBP/USPS-157 This interrogatory relates to the ability of a postal customer to claim mail for which a notice has been left, such as accountable mail, on a non-holiday Saturday at a facility that does not have retail window service available on that Saturday. If there is a different pick-up rule for a carrier customer vs. a post office box customer, please explain.

[a] Is it mandated that this ability exist?

[b] If not mandated, is it the normal custom to provide such service?

[c] If not, why not?

The Postal Service objects to these questions on the grounds of relevance. Mr. Popkin's motion to compel suggests that this interrogatory somehow relates to value of service. However, this interrogatory is not relevant to any particular class of mail, although it is consistent with the proponent's fascination with Saturday service. In rate case terms, value of service can only be determined by comparing the service between different classes of mail. The requested details could have no impact on any argument the proponent cares to make regarding any rate, fee or classification at issue in this

docket. His long term fascination with Saturday details, and other information provided in this docket on Saturday services already permit him to make any argument he wants.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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